

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

OMEGA THERAPEUTICS, INC., *et al.*,

Debtor.

Chapter 11

Case No. 25-10211 (BLS)

**NOTICE OF (I) FILING OF CHAPTER 11 PETITION AND RELATED
DOCUMENTS AND (II) AGENDA FOR HEARING SCHEDULED FOR
FEBRUARY 11, 2025, AT 11:00 A.M. (EASTERN TIME)**

This proceeding will be conducted in person and via Zoom.

**Please refer to Judge Shannon's Chambers Procedures
(<https://www.deb.uscourts.gov/judge-brendan-l-shannon>) and the Court's website
(<http://www.deb.uscourts.gov/ecourt-appearances>) for information on the method of
allowed participation (video or audio), Judge Shannon's expectations of remote
participants, and the advance registration requirements. Registration should be
completed at least 1 hour prior to the start of the hearing, unless otherwise noticed, using
the eCourtAppearances tool available on the Court's website.**

PLEASE TAKE NOTICE that, on February 10, 2025, the debtor and debtor in possession in the above-captioned chapter 11 case (the "Debtor") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), and related motions with the United States Bankruptcy Court for the District of Delaware. The Debtor is a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The automatic stay of Section 362(a) of the Bankruptcy Code is in effect.

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the following first day motions (collectively, the "First Day Motions"), to the extent set forth below, is scheduled for **February 11, 2025, at 11:00 a.m. (Eastern Time)** (the "First Day Hearing") before The Honorable Brendan Linehan Shannon, United States Bankruptcy Judge for the District of Delaware.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made at the First Day Hearing.

PETITION

1. Chapter 11 Voluntary Petition ([D.I. 1](#), filed 2/10/25).

Related Documents:

- A. Notice of Hearing to Consider First Day Motions ([D.I. 23](#), filed 2/10/25).

DECLARATION IN SUPPORT OF FIRST DAY MOTIONS

2. Declaration of Kaan Certel in Support of Debtor's Chapter 11 Petition and First Day Motions ([D.I. 19](#), filed 2/10/25).

MATTERS GOING FORWARD

3. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Debtor to (A) Continue Its Existing Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Its Bank Accounts and Existing Business Forms, and (D) Implement Changes to the Existing Cash Management System as Necessary, (II) Extending the Time to Comply with the Requirements of 11 U.S.C. § 345(b) and the U.S. Trustee's Operating Guidelines, and (III) Granting Related Relief ([D.I. 3](#), filed 2/10/25).

Status: This matter is going forward.

4. Debtor's Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Utility Services, (II) Approving Proposed Adequate Assurance of Payment to Utility Providers and Authorizing Debtor to Provide Additional Assurance, (III) Establishing Procedures to Resolved Requests for Additional Assurance and (IV) Granting Related Relief ([D.I. 4](#), filed 2/10/25).

Status: This matter is going forward.

5. Motion of Debtor for Entry of Interim and Final Orders Establishing Notification and Hearing Procedures for, and Approving Restrictions on, Certain Transfers of, and Declarations of Worthlessness with Respect to, Interests in the Debtor's Estate ([D.I. 5](#), filed 2/10/25).

Status: This matter is going forward.

6. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Pay Certain Prepetition Taxes and Fees, and (III) Granting Related Relief ([D.I. 6](#), filed 2/10/25).

Status: This matter is going forward.

7. Debtor's Motion for Entry of an Order (I) Authorizing Debtor to Seal Certain Personally Identifiable Information for Individuals and (II) Granting Related Relief ([D.I. 7](#), filed 2/10/25).

Status: This matter is going forward.

8. Debtor's Motion for Interim and Final Orders (I) Authorizing Payment of Prepetition Claims of Certain Critical Vendors and (II) Granting Related Relief ([D.I. 8](#), filed 2/10/25).

Status: This matter is going forward.

9. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Debtor to (A) Pay Certain Prepetition Employment Obligations and (B) Maintain Employee Benefits Programs and (II) Granting Related Relief ([D.I. 9](#), filed 2/10/25).

Status: This matter is going forward.

10. Motion of Debtor for Interim and Final Orders (I) Authorizing Debtor to Continue Its Insurance Program and Pay All Obligations with Respect Thereto, (II) Honor Certain Prepetition Obligations Related to the Foregoing, (III) Renew, Revise, Extend, Supplement, Change or Enter into New Insurance Coverage as Needed in its Business Judgment, and (IV) Granting Related Relief ([D.I. 10](#), filed 2/10/25).

Status: This matter is going forward.

11. Debtor's Application for Appointment of Kroll Restructuring Administration LLC as Claims and Noticing Agent ([D.I. 11](#), filed 2/10/25).

Status: This matter is going forward.

12. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to the Prepetition Lender, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief ([D.I. 16](#), filed 2/10/25).

Related Documents:

- A. Declaration of Lisa K. Lansio in Support of Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to the Prepetition Lender, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief ([D.I. 17](#), filed 2/10/25).
- B. Declaration of Ryan Mersch in Support of Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to the Prepetition Lender, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief ([D.I. 18](#), filed 2/10/25).

Status: This matter is going forward.

Dated: February 10, 2025
Wilmington, Delaware

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

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